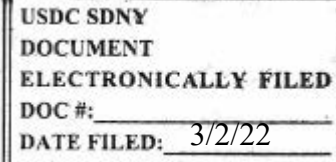


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

POLICYGENIUS INC.,  
Plaintiff,

v.

LEADSQUAD LLC and ARAGON  
ADVERTISING LLC,  
Defendants.



No. 21-cv-11005

**PERMANENT INJUNCTION  
ON CONSENT AND  
ORDER OF DISMISSAL**

**WHEREAS**, on December 22, 2021, Policygenius Inc. (“Plaintiff”) filed a complaint against LeadSquad LLC and Aragon Advertising LLC (collectively “Defendants”) for trademark infringement under the Lanham Act, 15 U.S.C. § 1114 and 15 U.S.C. §§ 1125(a), and cyberpiracy under 15 U.S.C. § 1125(d));

**WHEREAS**, Plaintiff and Defendants desire to resolve the dispute between them on the terms set forth in this Order;

**NOW THEREFORE, IT IS HEREBY ORDERED** as follows:

1. During the thirty (30) day period after the date of this Order (the “Phase-Out Period”), Defendants shall take all commercially reasonable steps to phase out use of the QUOTE GENIUS trademark, subject to Paragraph 4 of this Order.

2. Following the Phase-Out Period, and subject to Paragraph 4 of this Order, the Defendants, on behalf of themselves and their successors and assigns, shall cease all use of the QUOTE GENIUS trademark, and shall not thereafter adopt, use, or register, anywhere in the world, any word, term, symbol, mark, name, trade name, corporate name, domain name, device, or designation confusingly similar to POLICYGENIUS in



connection with any goods or services anywhere in the world. Pursuant to the safe distance rule, confusingly similar marks include, but are not limited to, any mark consisting of or containing the word GENIUS or words confusingly similar thereto, such as, without limitation, GENI and GENIE.

1. Within five (5) days of the date of this Order, Defendants shall (a) surrender the QUOTE GENIUS Trademark Registration (Reg. No. 5,512,111) for cancellation pursuant to 15 U.S.C. §1057(e), and (b) expressly abandon the QUOTE GENIUS Trademark Application (Serial No. 90/761,680) pursuant to 37 CFR § 1.138 by completing the USPTO online form for Request for Express Abandonment.

3. For a period of six (6) months after the date of this Order, the Quote Genius Parties shall have the right to use the domain name <quotegeni.us> (the “QUOTE GENIUS Domain Name”) for the purpose of directing web traffic to the domain name from which Defendants will operate their online auto insurance lead-generation business in connection with a new trademark (“Transition Period”).

2. Within ten (10) business days following the end of the Transition Period, Defendants shall execute all documents, papers, forms, and authorizations, and take such other actions as are necessary to effectuate the transfer of ownership and control of the QUOTE GENIUS Domain Name to Policygenius.

3. This action is dismissed with prejudice. No appeals shall be taken from this Order. The Parties shall bear their own costs and attorneys’ fees in conjunction with this action.



4. Jurisdiction over this case is retained by the Court to enforce compliance with this Order. In any dispute concerning this Order, the prevailing party shall recover its attorneys' fees and costs, it being agreed that the standard hourly rates of the parties' counsel who represented the parties in this litigation are reasonable.

Date: March 1, 2022

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*Attorneys for Policygenius Inc.*

SO ORDERED

Alison D. Nathan

Hon. Judge Alison Nathan

~~February~~ 2, 2022

March